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August 20, 2023


Via ECF

Hon. Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square
New York NY 10007

Application granted.

SO ORDERED.

United States v. Shmuel Abraham, 20-cr-411-RA



Ronnie Abrams, U.S.D.J.
August 22, 2023

Dear Judge Abrams:

We respectfully write to request permission for Shmuel Abraham to travel to Canada from August 23–25.

Mr. Abraham and his wife would like to be able to travel to Canada to visit her family, who live outside of Montreal. Due to his travel restrictions, the Abrahams have been unable to travel to visit her family since the onset of this case in 2020.

If Your Honor grants this request, Mr. Abraham would drive to Canada on August 23 and return by Friday the 25th. In order to further ensure both the government and Court that he will return, he is not seeking the return of his passport, and will travel into Canada using his birth certificate and driver's license. He will also provide his pre-trial officer with his full itinerary.

I have spoken to both Mr. Abraham's pre-trial officer and the assigned AUSA and neither takes any position on this request.

Respectfully,
/s/
Gedalia Stern

Cc: Jilan Kamal (via ECF)